

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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RONDA SHIP MANAGEMENT INC., :

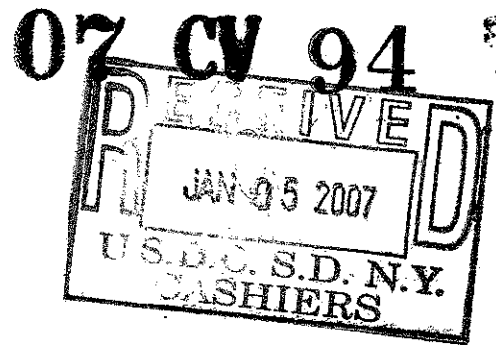
Plaintiff, :

- against - :

DOHA ASIAN GAMES ORGANISING :
COMMITTEE a/k/a DAGOC, :

Defendant. :
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JUDGE McMAHON



VERIFIED COMPLAINT

The Plaintiff, RONDA SHIP MANAGEMENT INC. (hereinafter "Plaintiff"), by its attorneys, Tisdale & Lennon, LLC, as and for its Verified Complaint against the Defendant, DOHA ASIAN GAMES ORGANISING COMMITTEE a/k/a DAGOC, (hereinafter "Defendant") alleges, upon information and belief, as follows:

1. This is an admiralty and maritime claim within the meaning of Federal Rule of Civil Procedure 9(h) and 28 United States Code § 1333.
2. At all material times, Plaintiff was and still is an entity duly organized and existing by virtue of the laws of Liberia.
3. Upon information and belief, at all material times, Defendant was and still is an entity duly organized and existing by virtue of foreign law.
4. By two charter parties dated October 26, 2006, Plaintiff chartered the motor vessels "MONA LISA" and "NEW FLAMENCO" (hereinafter the "Vessels") from their respective Head Owners. Thus, at this time, Plaintiff became disponent Owner of the Vessels.

5. By two charter parties dated October 23, 2006, Plaintiff chartered the Vessels to Defendant for floating hotel accommodations and services of the same.

6. Certain disputes arose between the parties regarding Defendant's repudiation/renunciation of the charter party contracts.

7. As a result of Defendant's breach of the charter party contracts, Plaintiff has and will continue to suffer losses in the total principal sum of \$15,000,000.00, as best can now be estimated, exclusive of interest, recoverable costs and reasonable attorneys fees.

8. Pursuant to the charter parties, all disputes arising thereunder were to be submitted to the London High Court of Justice in London with English law to apply.

9. Defendant has failed to pay Plaintiff the damages resulting from its repudiation/renunciation of the charter parties.

10. As a result, Plaintiff is currently preparing to commence litigation on its claims.

11. Interest, costs and attorneys' fees are routinely awarded to the prevailing party in London proceedings pursuant to English Law. As best as can now be estimated, Plaintiff expects to recover the following amounts pursuant to the final judgment and award of costs:

A.	Principal claim:	\$15,000,000.00
B.	Estimated interest on the principal claim at 6.0% for three years	\$2,937,199.02
C.	Attorneys fees and other recoverable costs: (approx. £ 500,000.00)	\$965,995.24

Total: **\$18,903,194.26**

12. The Defendant cannot be found within this District within the meaning of Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure, but, upon information and belief, Defendant has, or will have during the

pendency of this action, assets within this District and subject to the jurisdiction of this Court, held in the hands of garnishees including, but not limited to, ABN-AMRO, American Express Bank, Bank of America, Bank of India, Bank of New York, Barclays Bank, BNP Paribas, Deutsche Bank, Calyon, Credit Suisse, Citibank, HSBC Bank USA Bank, J.P. Morgan Chase, Standard Chartered Bank, UBS AG and/or Wachovia Bank N.A., which are believed to be due and owing to the Defendant.

13. The Plaintiff seeks an order from this Court directing the Clerk of Court to issue Process of Maritime Attachment and Garnishment pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims attaching any assets of the Defendant held by the aforesaid garnishees for the purpose of obtaining personal jurisdiction over the Defendant, and to secure the Plaintiff's claims as described above.

WHEREFORE, Plaintiff prays:

A. That process in due form of law issue against the Defendant, citing it to appear and answer under oath all and singular the matters alleged in the Complaint;

B. That since the Defendant cannot be found within this District pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims, this Court issue an Order directing the Clerk of Court to issue Process of Maritime Attachment and Garnishment pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims and federal common law attaching all tangible or intangible property in whatever form or any other funds held by any garnishee, including, but not limited to, ABN-AMRO, American Express Bank, Bank of America, Bank of India, Bank of New York, Barclays Bank, BNP Paribas, Deutsche Bank, Calyon, Credit Suisse, Citibank, HSBC Bank USA Bank, J.P. Morgan Chase, Standard Chartered Bank, UBS AG and/or Wachovia Bank N.A. which are due and owing to the

Defendant, in the amount of \$18,903,194.26 to secure the Plaintiff's claims, and that all persons claiming any interest in the same be cited to appear and pursuant to Supplemental Admiralty Rule B answer the matters alleged in the Verified Complaint;

C. That this Court recognize and confirm any foreign judgment/award of costs on the claims had herein as a judgment of this Court;

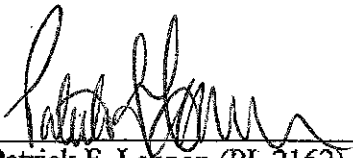
D. That this Court retain jurisdiction over this matter through the entry of any judgment or award associated with any of the claims currently pending, or which may be initiated in the future, including any appeals thereof; and

E. That the Plaintiff have such other, further and different relief as the Court may deem just and proper.

Dated: January 5, 2007
New York, New York

The Plaintiff,
RONDA SHIP MANAGEMENT INC.

By:



Patrick F. Lennon (PL 2162)
Nancy R. Peterson (NP 2871)
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ATTORNEY VERIFICATION

State of New York)
) ss: NEW YORK
County of New York)

1. My name is Patrick F. Lennon.
2. I am over 18 years of age, of sound mind, capable of making this Verification and fully competent to testify to all matters stated herein.
3. I am the attorney for the Plaintiff in this action. I am fully authorized to make this Verification on its behalf.
4. I have read the foregoing Verified Complaint and the contents thereof are true and accurate to the best of my knowledge, information and belief.
5. The reason that this Verification was made by me and not the Plaintiff is that the Plaintiff is a corporation none of whose officers are present in this District.
6. The source of my knowledge is information and records furnished to me by the Plaintiff and its counsel, all of which I believe to be true and accurate.

Dated: January 5, 2007
Southport, Connecticut


Patrick F. Lennon